

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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NXIVM CORPORATION, formerly known as EXECUTIVE
SUCCESS PROGRAMS, INC. and FIRST PRINCIPLES, INC.,

Plaintiffs,

- against -

MORRIS SUTTON, ROCHELLE SUTTON, THE ROSS
INSTITUTE, RICK ROSS a/k/a "RICKY" ROSS, STEPHANIE
FRANCO, PAUL MARTIN, Ph.D., and WELLSRING RETREAT,
INC.,

Defendants.

Civil Action No. 2:06-cv-01051
(KSH/CLW)

-----X
RICK ROSS,

Counterclaim Plaintiff,

- against -

KEITH RANIERE, NANCY SALZMAN,
KRISTIN KEEFFE, INTERFOR, INC.,
JUVAL AVIV, JANE DOE and JOHN DOES 1-10,

Counterclaim Defendants.

**[PROPOSED] ORDER FOR
TURNOVER OF FUNDS**

(Interfor, Inc. v. NXIVM Corp.)

-----X
INTERFOR, INC. and JUVAL AVIV,

Crossclaimants,

- against -

NXIVM CORPORATION, KEITH RANIERE,
NANCY SALZMAN and KRISTIN KEEFFE,

Crossclaim Defendants.

THIS MATTER having been brought before the Court by Notice of Motion by crossclaim plaintiff Interfor, Inc. (“Interfor”) for an Order requiring the turnover of all funds held by TD Bank, N.A. pursuant to the Writ of Execution issued by this Court on November 21, 2021 [D.E. 892] and returned executed on November 24, 2021 [D.E. 894], and the Court having considered the application and any opposition submitted, and for good cause shown;

IT IS, on this _____ day of _____, 2022:

ORDERED that all funds held by TD Bank, N.A. pursuant to the above-referenced Writ of Execution be turned over to the office of Friedman Kaplan Seiler & Adelman LLP, as attorneys for Interfor, in the amount of \$49,882.39; and it is

FURTHER ORDERED that a copy of this Order shall be served on NXIVM by regular mail to its last known business address and its registered agent within ____ days of the entry of this Order.

SO ORDERED:

Hon. Katharine S. Hayden, U.S.D.J